

**Air Quality Conformity Task Force  
Summary Meeting Notes  
November 30, 2011**

Attendance:

Mike Brady – Caltrans

Dick Fahey – Caltrans

Glenn Knoshita – Caltrans

Aijun Ding – Caltrans

Ginger Vagenas – EPA

Ted Matley – FTA

Stew Sonnenberg– FHWA

Hisham Noeimi – CCTA

Lynn McIntyre – URS

Ramesh Sathiamurthy – URS

Stefanie Hom – MTC

Ashley Nguyen – MTC

Sri Srinivasan – MTC

1. **Welcome and Self Introductions:** Stefanie Hom (MTC) called the meeting to order at 9:30 am. See attendance roster above.
2. **PM<sub>2.5</sub> Interagency Consultations:** To begin the interagency consultations for PM<sub>2.5</sub> project level conformity, Stefanie Hom (MTC) asked the project sponsors to give a brief overview of their projects prior to opening up the projects for questions by the Task Force.

***POAQC Status Determinations***

*San Pablo: I-80/San Pablo Dam Rd I/C Modifications*

Hisham Noeimi (CCTA) gave an overview of the project. The project will replace the existing four-lane San Pablo Dam Road Overcrossing in the City of San Pablo with a new six-lane structure. The nonstandard El Portal Drive on-ramp to westbound I-80 will be relocated approximately 2,000 feet north of the existing isolated on-ramp, creating a full diamond interchange at El Portal Drive and addressing the insufficient weaving distance on westbound I-80 between El Portal Drive and San Pablo Dam Road. The existing McBryde Avenue off-ramp from westbound I-80 will be closed and replaced by access via a new one-way connector road from the San Pablo Dam Road off-ramp from westbound I-80. The project will improve pedestrian and bicycle access in the project area by including Class II bicycle lanes on local streets affected by the project, ADA-compliant curb ramps, and an improved new pedestrian overcrossing structure at Riverside Avenue.

Hisham indicated that the project is currently in the design phase. FHWA issued conformity determination on November 18, 2009 and the NEPA process for Initial Study/Environmental Assessment was completed in February 2010. There were no comments on air quality.

Lynn McIntyre (URS), working with CCTA on the project, indicated that this project is an interchange replacement and is not a new or expanded highway project; no additional through lanes would be added on I-80. Data shows that the differences between the truck percentages for the build and no-build scenarios would be 0.35 percent in 2016, and 0.8 percent in the horizon year. There would be a 1 percent difference in truck percentage, which would not be a significant increase.

Lynn further explained that diesel vehicles represent a maximum of 5 percent of traffic volume on I-80, which does not constitute a significant portion of total traffic, and there would be no project changes to land use that would affect diesel traffic percentage. The existing ramp

intersections within the project that currently operate at LOS E or F will be improved to operate at LOS D or better. She also noted that interchange reconfiguration projects, which this project is, are examples of projects that are not projects of air quality concern in the EPA and FHWA conformity guidance.

Mike Brady (Caltrans) indicated that since the project is a basic interchange modification not affecting a main line, it is not a project of air quality concern. He asked if the project would add any auxiliary lanes.

Hisham responded that there would be no additional auxiliary lanes added, just extending the existing one.

Mike indicated that if the project included a new auxiliary lane, then there would be need to be an analysis of how it affects the main line.

Ginger Vagenas (EPA) indicated that the project states that it would be insufficient to accommodate future traffic, which seems to be at odds with the projections where there is not a lot of difference between build and no build projections.

Lynn responded that it has to do with traffic operations at those interchanges. Under the no-build scenario, the McBryde Avenue westbound exit would still be open. So it would be creating a bottleneck.

Ramesh Sathiamurthy (URS) added that the on-ramp issue is creating congestion in westbound direction. The initial analysis revealed that there is an unacceptable level of service because of the close proximity of the two ramps. Eliminating one off/on-ramp and creating a free-flow frontage road from San Pablo Dam Road to McBryde Avenue would improve travel time.

Ginger indicated that the way the project description is worded makes it sound like the project would accommodate future traffic.

Hishan clarified that the intersections at the San Pablo Dam Road interchange are currently operating at LOS F and E, and failing during peak hours. Any additional future traffic without improvements would continue to fail. The project would improve the intersections to LOS D or above. Separating the local street from that intersection would create more free flow.

Stew Sonnenberg (FHWA) indicated that it is a good project; it is mainly operational improvements.

Dick Fahey (Caltrans) indicated that traffic volume estimates are conservative and traffic on that stretch has actually come down from 2007. Overall, there is no real change in truck volumes between the build and no-build scenarios.

***Final Determination:*** FHWA, Caltrans, EPA, FTA, and MTC concurred that this project is not a POAQC.

*Caltrans: US-101 Auxiliary Lanes*

Glenn Knoshita (Caltrans) gave an overview of the project. The project proposes to add auxiliary lanes in both directions of US-101, from the Embarcadero Road Interchange in the City of Palo Alto to the Marsh Road Interchange in the City of Menlo Park. The NEPA process for Initial Study with Negative Declaration/Environmental Assessment is complete and is now seeking air quality conformity determination.

Glenn indicated that there would be no change in truck percentages on US-101. The projections indicate that for year 2015, the highest truck percentage would be 1.89 percent and the highest truck volume for both directions combined would be 3884 AADT. For year 2035, the highest truck percentage would be 1.89 percent and the highest truck volume for both directions combined would be 3950 AADT.

Glenn further explained that heavy duty vehicles represent 1.66 to 1.89 percent of total traffic volume. Ramp LOS's do not show improvement, however, vehicle-hours of delay show improvements for the corridor under the build scenario for both 2015 and 2035. There are no projected changes to land use that would affect diesel traffic percentages.

Mike Brady (Caltrans) asked if there is a portion that is adjacent to residential, and if so, is there a sound wall already there?

Glenn responded that there is an existing sound wall in place.

**Final Determination:** FHWA, Caltrans, EPA, FTA, and MTC concurred that this project is not a POAQC.

### **PM<sub>2.5</sub> Conformity Exempt List Review**

Stefanie Hom (MTC) asked if there were any questions about any of the projects on the exempt list.

Dick Fahey (Caltrans) asked for clarification on the "So. Hayward BART/Dixon St Streetscape – Utilities" project (TIP ID: ALA110087). The project type describes the project as bicycle and pedestrian facilities, but that information is not included in the project description.

Sri Srinivasan (MTC) clarified that the project is a sump project that is underground a bicycle and pedestrian facility. That information is included in the expanded description.

Mike Brady (Caltrans) indicated that that information should be made clear in the expanded description.

**Final Determination:** FHWA, Caltrans, EPA, FTA, and MTC concurred that the projects on the exempt list are exempt from project level PM 2.5 conformity.

3. **Defining Minor Fleet Expansions:** Sri Srinivasan (MTC) indicated that MTC would like the Task Force to revisit the topic of setting a threshold for "minor fleet expansion" in the Bay Area in order to allow project sponsors to take advantage of the exemption code 40 CFR 93.126 – "Mass Transit – Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet." MTC and FTA believe that the Bay Area is disadvantaged by not being able to fully use the exemption, and would like to decide upon a specific threshold for the Bay

Area that is a reasonable exemption while remaining within the language of the exemption code.

Ted Matley (FTA) indicated that there is no standardized approach to this issue. The New York/New Jersey region has a 10 percent standard, but they have very large operators. Other regions, such as Denver/Wyoming, exempt all fleet expansions. Historically, there was a uniform approach and FTA instructed all regions to use a 20 percent fleet expansion standard. The problem with that approach was that it penalized small operators because any fleet size was considered a major expansion, which was not the intent of regulation. As a result, FTA withdrew that guidance.

Ted further explained that there needs to be a standard that works for the Bay Area. The Bay Area is different from other regions, since there are a variety of operators and fleet sizes. FTA was advised that they should aggregate the regional fleet. As for defining the threshold, what MTC defines is different than other regions. The approach is nothing new and widely used in TIP applications. By using two thresholds, it captures everything we want. It is set-up so that nothing big is going to escape scrutiny. FTA and MTC are not trying to keep small transit fleet expansions from happening, but would like to make sure larger ones receive the scrutiny they require.

Ted added that if fleet expansions are done on a case by case basis, the people reviewing these projects are going to ask what kind of thresholds apply to these situations. So there still needs to be thresholds. Ted suggested that to set standards for fleet expansions and see how it works. MTC has done a lot of work to come up with something that meets their region's needs in a way that does not penalize small operators.

Ashley Nguyen (MTC) indicated that MTC has done a lot of research on this issue. They are happy to add supplemental research based on what is happening in other regions. MTC has been asking EPA to review and consider this request, and would be happy to address any remaining issues that EPA has.

Ginger Vagenas (EPA) indicated she consulted with OTAC and Karina O'Connor from EPA, and they are not comfortable with setting a threshold. EPA believes there is value in looking at projects on a case by case basis. There needs to be discussion on this issue at a higher level.

Ted asked if FTA and EPA should try to set up a discussion.

Mike Brady (Caltrans) indicated that the Bay Area has a couple of large fleets and a lot of small fleets. For example, San Joaquin County has several moderately-sized fleets and a lot of small ones, and they need to look at each case down. In LA, a flat expansion percentage would allow their operators to expand by hundreds of buses. Expansions do need to be looked at on a case by case basis since operators do vary by area.

Sri clarified that the threshold suggested by MTC would allow a cost change of up to 40% of the total project cost or \$10 million, whichever is more restrictive. This would still restrict the large operators from adding more than 20 or 25 buses to their fleet, which is not much.

Mike responded that that approach sounds good.

Sri indicated that MTC tried to come up with solution that would help small operators while restricting big ones.

Ted indicated that the dollar threshold was added during the TIP process and they have been using that approach for a long time.

Ginger indicated that the proposed threshold is a sensible approach that allows flexibility for smaller operators while limiting larger ones. But there needs to be discussion between FTA and EPA to reach an agreement.

Mike added that the threshold does not need to be a rule of thumb, but more of a guidance that allows flexibility. He would like to bring this issue to the statewide conformity group in March 2012.

Ted indicated that he will coordinate with Ginger to get discussions between FTA and EPA started.

4. **Consent Calendar:** Stefanie Hom (MTC) asked for questions on any items on the exempt calendar. There were no questions on any items on the consent calendar.

***Final Determination:*** All items on the consent calendar were approved by FHWA, Caltrans, EPA, FTA and MTC.

## 5. Other Business/Adjourn

Stefanie Hom (MTC) reminded that the next meeting will be on January 26, 2012.

Stefanie adjourned the meeting at approximately 10:10 am.